

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 05-11576-DPW

PARTNERS HEALTHCARE
SYSTEM, INC.,

Defendant.

**DEFENDANT PARTNERS HEALTHCARE SYSTEM, INC.'S
UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Defendant Partners Healthcare System, Inc. ("Partners") hereby submits this unopposed motion for an extension of time to respond to Plaintiff's Motion for Summary Judgment, filed on January 20, 2006.¹ Partners has consulted with Plaintiff and Plaintiff does not oppose this motion. Partners requests an extension of three weeks, thereby moving the date its response is due from February 3, 2006 to February 24, 2006. Partners seeks an extension due to the complicated nature of the issues raised in Plaintiff's motion and the substantial amount of work that is required to prepare its response. Further, Partners requests extra time because a principal member of its litigation team is currently unavailable due to the imminent death of his father.

Granting this extension will not prejudice Plaintiff or otherwise effect the Court's Scheduling Order, which allows summary judgment motions to be filed until April 29, 2006.

¹ Pursuant to Section G of the United States District Court for the District of Massachusetts Electronic Case Filing Administrative Procedures, electronic submissions of documents completed after 6:00 p.m. are considered filed on the following day.

Partners therefore respectfully requests that the deadline for its response be extended from February 3, 2006 to February 24, 2006.

Dated: January 24, 2006

/s/ Sarah E. Hancur

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CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Partners Healthcare System, Inc. certifies that they have conferred with Plaintiff and attempted in good faith to resolve this issue.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non registered participants on January 24, 2006.

/s/ Sarah E. Hancur
Sarah E. Hancur

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 05-11576-DPW

PARTNERS HEALTHCARE
SYSTEM, INC.,

Defendant.

**PROPOSED ORDER GRANTING DEFENDANT'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Pending before the Court is Defendant Partners Healthcare System, Inc.'s unopposed motion for an extension of time to respond to Plaintiff's Motion for Summary Judgment, filed on January 20, 2006. Due notice having been given, all parties having been represented by counsel, the Court having considered the memoranda submitted by the parties, and the Court being fully advised,

It is hereby ORDERED that Defendant's motion be GRANTED and that the deadline for Partners Healthcare System, Inc.'s response is extended from February 3, 2006 to February 24, 2006.

So ORDERED this _____ day of January, 2006.

JUDGE DOUGLAS P. WOODLOCK
UNITED STATES DISTRICT COURT JUDGE